



One Delta Drive
Mechanicsburg, PA 17055

August 31, 2023

Katie Merritt, Director of Policy and Planning
Office of the Insurance Commissioner
1326 Strawberry Square
Harrisburg, PA 17120

Re: Commonwealth Essential Health Benefits Benchmark Plan—Public Comment
Period; Notice 2023-14

Dear Director Merritt:

On behalf of Delta Dental of Pennsylvania (“Delta Dental”), which provides approximately 41,750 Pennsylvanians with quality dental care coverage via your state-based exchange (“Pennie”), thank you for the opportunity to provide feedback on the essential health benefits benchmark plan as requested in Notice 2023-14.

We recommend the following additional dental services be included as covered in the benchmark. Their addition reflects good comprehensive coverage and they are included in our standard coverage, and some are included in the FEDVIP EHB benchmark used for multiple state exchange dental plans. The utilization of these additional services would be comparatively low and would not be cause for any pricing adjustment.

CDT Code	Nomenclature
D0145	Oral evaluation for a patient under three years of age and counseling with primary caregiver
D1354	Application of caries arresting medicament - per tooth
D2990	Resin infiltration of incipient smooth surface lesions
D2991	Application of hydroxyapatite regeneration medicament – per tooth
D4241	Gingival flap procedure, including root planing - one to three contiguous teeth or tooth bounded spaces per quadrant
D4261	Osseous surgery (including elevation of a full thickness flap and closure) - one to three contiguous teeth or tooth bounded spaces per quadrant
D4263	Bone replacement graft - retained natural tooth - first site in quadrant
D4275	Non-autogenous connective tissue graft (including recipient site and donor material) first tooth, implant, or edentulous tooth position in graft
D4285	Non-autogenous connective tissue graft procedure (including recipient surgical site and donor material) - each additional contiguous tooth, implant or edentulous tooth position in same graft site
D5725	Rebase hybrid prosthesis
D5765	Soft liner for complete or partial removable denture – indirect
D7953	Bone replacement graft for ridge preservation - per site

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Further, the current benchmark format includes embedded CDT codes to identify covered services, yet we note that in the eight years since the benchmark was originally published several CDT codes identified for covered services no longer exist, and each have been replaced with multiple new codes. We recommend that, regardless of whether the benchmark for pediatric dental is updated, the identified services below should include an update to these covered CDTs. We further assume that all copayments identified for covered services, including those for the replacement CDTs, will be reviewed for an updated benchmark if the current format will be retained.

Deleted CDT Code	Replacement CDT Code	Nomenclature
D1515	D1516	Space maintainer - fixed - bilateral, maxillary
	D1517	Space maintainer - fixed - bilateral, mandibular
D1225	D1526	Space maintainer - removable - bilateral, maxillary
	D1527	Space maintainer - removable - bilateral, mandibular
D1550	D1551	Re-cement or re-bond bilateral space maintainer - maxillary
	D1552	Re-cement or re-bond bilateral space maintainer - mandibular
	D1553	Re-cement or re-bond unilateral space maintainer - per quadrant
D5281	D5282	Removable unilateral partial denture - one piece cast metal (including retentive/clasping materials, rests, and teeth), maxillary
	D5283	Removable unilateral partial denture - one piece cast metal (including retentive/clasping materials, rests, and teeth), mandibular
	D5284	Removable unilateral partial denture - one piece flexible base (including retentive/clasping materials, rests, and teeth) - per quadrant
	D5286	Removable unilateral partial denture - one piece resin (including retentive/clasping materials, rests, and teeth) - per quadrant
D5510	D5512	Repair broken complete denture base, maxillary
	D5611	Repair resin partial denture base, mandibular
	D5612	Repair resin partial denture base, maxillary
D5620	D5621	Repair cast partial framework, mandibular
	D5622	Repair cast partial framework, maxillary
D9220	D9222	Deep sedation/general anesthesia - first 15 minutes
	D9223	Deep sedation/general anesthesia - each subsequent 15 minute increment
D9242	D9239	Intravenous moderate (conscious) sedation/analgesia - first 15 minutes
	D9243	Intravenous moderate (conscious) sedation/analgesia - each subsequent 15 minute increment
D9940	D9943	Occlusal guard adjustment
	D9944	Occlusal guard - hard appliance, full arch
	D9945	Occlusal guard - soft appliance, full arch
	D9946	Occlusal guard - hard appliance, partial arch

We appreciate the opportunity to provide comments on this proposal. Please let me know if there are any questions related to this submission.

Sincerely,



Jeff Album
Vice-President, Public and Government Affairs